

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: COLEEN BURNS	:	CHAPTER 13
Debtor(s)	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
COLEEN BURNS	:	
Respondent(s)	:	CASE NO. 5-19-bk-04098

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 8th day of February, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:

- a. The plan is inconsistent with Proofs of Claims filed and/or approved by the Court – as to the Proof of Claim by Yang for \$99,446.00; plan pays \$81,000.00.
- j. Plan ambiguous – Base amount. More specifically, the plan calculation in Paragraph 9 says R.E. Tax Claims/Mtgs 2D @ \$128,127.43. Paragraph 2D also provides for a municipal claim and secured taxes owed to PA Revenue. Further the R.E. Taxes and mortgages in 2D do not equal \$128,127.43.

2. Trustee avers that debtor(s)' plan cannot be administered due to the lack of the following:

- a. Proof of Claim for Luzerne County Tax Claim for Stanton Street.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

CERTIFICATE OF SERVICE

AND NOW, this 8th day of February, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Kevin Walsh, Esquire  
297-299 Pierce Street  
Kingston, PA 18704

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee